

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

AGILENT TECHNOLOGIES, INC.,

Plaintiff,

v.

XPEDIENT MANAGEMENT GROUP, LLC
and ST. PAUL FIRE AND MARINE
INSURANCE COMPANY,

Defendants.

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No. 2:25-cv-02101

JURY DEMAND

UNOPPOSED MOTION FOR WITHDRAWAL AND SUBSTITUTION OF COUNSEL

COMES NOW the Defendant, St. Paul Fire and Marine Insurance Company (“St. Paul”), to submit its Unopposed Motion for Withdrawal and Substitution of Counsel pursuant to *Local Rule* 83.5.

As grounds for this motion, St. Paul would show that Paige I. Bernick, Peter C. Robison, and Ryan N. Clark of the law firm Lewis Thomason, P.C. all filed notices of appearance on behalf of St. Paul on February 24, 2025. [Doc 16]; [Doc 17]; [Doc 18]. Recently, St. Paul elected to change its representation in the defense of this matter. For that reason, Paige I. Bernick, Peter C. Robison, and Ryan N. Clark of Lewis Thomason, P.C. request that they be permitted to withdraw as attorneys of record in this case. Likewise, Sean W. Martin and Michael J. Petherick of the law firm Carr Allison request to be substituted as counsel of record for St. Paul. As reflected in the certificate of consultation below, the relief requested in this motion is unopposed. Pursuant to *Local Rule* 7.2(a)(1)(A), a proposed order granting the relief requested in this motion is being submitted by email.

WHEREFORE, St. Paul respectfully requests that the Court enter an order granting this motion, permitting Paige I. Bernick, Peter C. Robison, and Ryan N. Clark of Lewis Thomason, P.C. to withdraw as counsel of record for St. Paul, and substituting Sean W. Martin and Michael J. Petherick of Carr Allison as counsel of record for St. Paul.

Respectfully submitted,

CARR ALLISON

BY: /s/ Michael J. Petherick
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LEWIS THOMASON, P.C.

BY: /s/ Paige I. Bernick
(by MJP, w/permission)
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CERTIFICATE OF CONSULTATION

Pursuant to *Local Rule 7.2(a)(1)(B)*, on May 15, 2025, undersigned counsel conferred by email with Plaintiff's counsel, Douglas F. Halijan, about the relief requested in this motion. At that time, it was determined that the relief requested in this motion is not opposed by Plaintiff. On May 13, 2025, undersigned counsel conferred by email with counsel for Defendant Xpedient Management Group, LLC, William P. Thomas and Andrew Schrack, about the relief requested in this motion. Xpedient Management Group does not oppose the relief requested in this motion.

BY: /s/ Michael J. Petherick**MICHAEL J. PETHERICK, BPR #036155****CERTIFICATE OF SERVICE**

I hereby certify that on May 20, 2025, I electronically filed an **UNOPPOSED MOTION FOR WITHDRAWAL AND SUBSTITUTION OF COUNSEL** with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to the following attorneys of record:

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BY: /s/ Michael J. Petherick**MICHAEL J. PETHERICK, BPR #036155**